

United States Courts  
Southern District of Texas  
FILED

June 16, 2020

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA,

v.

(96) TRANG LE NGUYEN,  
a/k/a NGUYEN LE THIEN TRANG,

Defendant.

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§  
§ Criminal No.:  
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**4:20-cr-265**

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

**(Obstructing and Impeding the Due Administration of Justice)**

On or about March 26, 2019, in the Houston Division of the Southern District of Texas,

**(96) TRANG LE NGUYEN, a/k/a NGUYEN LE THIEN TRANG,**

the defendant, did corruptly and by any threatening communication, influence, obstruct and impede and endeavor to influence, obstruct and impede the due administration of justice in a federal judicial proceeding in the United States District Court for the Southern District of Texas, by, after preparing paperwork associated with one or more of the fraudulent marriages identified in indictment H-4:19-cr-00234-S, informing K.M.N.N., an individual who was a party to one of the fraudulent marriages identified in that indictment and whom had provided information on the scheme to federal law enforcement that was the subject of an ongoing federal judicial proceeding investigation, that K.M.N.N. should, as a result of her providing such information to law enforcement, go into hiding so as to not be found by federal law enforcement, not engage in any air travel that may alert federal law enforcement to her presence, and not provide any further information to law enforcement.

**In violation of Title 18, United States Code, Section 1503(a).**

**COUNT TWO**

**(Tampering With a Witness, Victim, or Informant)**

On or about March 26, 2019, in the Houston Division of the Southern District of Texas,

**(96) TRANG LE NGUYEN, a/k/a NGUYEN LE THIEN TRANG,**

the defendant, did hinder, delay, prevent the communication by K.M.N.N. to Department of Homeland Security Special Agent Paul Skinner and United States Citizenship and Immigration Services Investigator and Immigration Officer Ronald Mauldin, law enforcement officers, of information relating to the commission of federal offenses, namely, violations of 8 U.S.C. sec. 1325(a), and 18 U.S.C. secs. 371, 1015, 1341, 1349, and 1546(a), and did knowingly attempt, corruptly persuade, and engage in misleading conduct toward K.M.N.N., and cause and induce K.M.N.N. to withhold testimony before a federal official proceeding, and be absent from and evade legal process to appear as a witness before a federal official proceeding with the intent to influence, delay, and prevent the testimony of K.M.N.N. in a federal official proceeding, by, after preparing paperwork associated with one or more of the fraudulent marriages identified in indictment H-4:19-cr-00234-S, informing K.M.N.N., an individual who was a party to one of the fraudulent marriages identified in that indictment and whom had provided information on the scheme to federal law enforcement that was the subject of an ongoing federal official proceeding, that K.M.N.N. should, as a result of her providing such information to law enforcement, go into hiding so as to not be found by federal law enforcement, not engage in any air travel that may alert federal law enforcement to her presence, and not provide any further information to law enforcement.

**In violation of Title 18, United States Code, Section 1512(b).**

**COUNT THREE**

**(Aiding and Abetting Immigration Fraud)**

From on or about April 25, 2018 to on or about June 1, 2018, in the Southern District of Texas,

**(96) TRANG LE NGUYEN, a/k/a NGUYEN LE THIEN TRANG,**

the defendant, aiding and abetting others known and unknown to the grand jury, did knowingly make under oath and subscribe as true under penalty of perjury a false statement with respect to a material fact in a Form I-485 Application to Register Permanent Residence or Adjust Status, a document required by the immigration laws and regulations prescribed thereunder, that is:

(a) In Part 10, question 1.b., the application had the box checked which stated “The interpreter named in Part 11, read to me every question and instruction on this application and my answer to every question in Vietnamese.” The interpreter identified in part 11 is **KEVIN PHAM**, who indicated with his signature on the same date that “I certify under penalty of perjury that: I am fluent in English and Vietnamese, which the same language specified in Part 10., Item Number 1.b., and I have read this applicant in the identified language every question and instruction on this application and his or her answer to every question. The applicant informed me that he or she understands every instruction, question, and answer on the application, including the Applicant’s Declaration and Certification, and has verified the accuracy of every answer.”

(b) In Part, 10, question 2, the application had the box checked which stated “At my request, the prepare named in Part 12., [Defendant] **TRANG LE NGUYEN** prepared this application for me based only upon information I provided or authorized.” The prepared identified in Part 12 is Defendant **TRANG LE NGUYEN**, who signed the application on or about May 30, 2018, and in so doing, stated “By my signature, I certify, under penalty of perjury, that I prepared this application at the request of the applicant. The applicant then reviewed this completed application and informed me that he or she understands all of the information contained in, and submitted with, his or he application, including the Applicant’s Declaration and Certification, and that all of this information is complete, true, and correct. I completed this application based only on the information that the application provided to me or authorized me to obtain or use.”

**In violation of Title 18, United States Code, Section 1546(a) and 2.**

**NOTICE OF CRIMINAL FORFEITURE**  
**(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))**

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), the United States gives notice to defendant,

**TRANG LE NGUYEN, a/k/a NGUYEN LE THIEN TRANG,**

that in the event of conviction of an offense in violation of Title 18, United States Code, Sections 1503 or 1512 as charged in Counts One and Two of this Indictment, all property, real or personal, which constitutes or is derived from proceeds traceable to such violation is subject to forfeiture.

**NOTICE OF CRIMINAL FORFEITURE**  
**(18 U.S.C. § 982(a)(6))**

Pursuant to Title 18, United States Code, Section 982(a)(6), the United States gives notice to defendants,

**(96) TRANG LE NGUYEN, a/k/a NGUYEN LE THIEN TRANG,**

that in the event of conviction of a violation of, or a conspiracy to commit a violation of, Title 18, United States Code, Section 1546 as charged in Count Three of this Indictment, the following is subject to forfeiture:

- (1) all conveyances, including vessels, vehicles, and aircraft, used in the commission of the offense(s);
- (2) all real and personal property that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense(s); and
- (3) all real and personal property that is used to facilitate, or is intended to be used to facilitate, the commission of the offense(s).



**Money Judgment**

The United States may seek the imposition of a money judgment.

**Substitute Assets**

In the event that a condition listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendants in substitution.

A TRUE BILL:

Signature on file

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FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK  
United States Attorney, Southern District of Texas



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